

REMARKS

Applicant appreciates the Examiner's attention to this application.

The Office Action rejects claims 1-2, 4-8, 10-14, 16-22, and 24-26 under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 6,829,480 to Mats V. Hoglund et al. ("Hoglund"), in view of U.S. Patent Application Pub. No. 2007/0058642 to Juejen Henri Eisnik ("Eisnik") and/or U.S. Patent Application Pub. No. 20050265363 to Xiaobao Chen ("Chen"). Applicant respectfully traverses those rejections.

Claims 1, 7, 13, and 21 are the independent claims in the present application. Each of those claims relates to mobile nodes with private home addresses. Specifically, the independent claims relate to modifying a packet from the mobile node by replacing an original source address with a public routable address. In addition, the independent claims relate to replacing an original source port with a source port of a public routable address. For instance, claim 1 recites the operation of "replacing ... the originating source port with a source port of the public routable address."

The Office Action recognizes that Hoglund does not disclose replacing the originating port with a source port of the public routable address. However, the Office Action asserts that Eisnik discloses the operation of replacing the originating port with a source port of the public routable address. The Office Action cites paragraphs 0039 and 0040 of Eisnik in support of this assertion. However, those paragraphs do not disclose an operation of replacing the originating port with a source port of the public routable address. To the contrary, paragraph 0040 of Eisnik states that the "source port 126-1 is generally unchanged and output as source port 126-2." Consequently, even if Hoglund and Eisnik were to be combined, the combination would not disclose or suggest all of the features recited in claim 1.

For at least the foregoing reasons, the Office Action fails to establish a prima facie case of obviousness for claim 1. In addition, the other independent claims involve features that are the same as or similar to the feature discussed above. Consequently, the Office Action fails to establish a prima facie case of obviousness for any of the independent claims. Furthermore, the dependent claims implicitly include the features of the respective parent claims.

In addition, dependent claim 4 involves modification of a response packet by "replacing the destination port in the response packet with the originating source port." Dependent claims 10, 17, and 24 involve the same or similar features. The Office Action rejects claims 4, 10, 17, and 24 as unpatentable over Hoglund and Eisek in view of Chen. However, the Office Action does not specifically discuss the operation of replacing the destination port in the response packet with the originating source port, and the Office Action does not indicate which part or parts of Chen allegedly disclose such an operation. In fact, the word "port" only appears five times in Chen, and none of those parts discuss the operation of replacing the destination port in the response packet with the originating source port.

Consequently, even if Hoglund, Eisek, and Chen were to be combined, the combination would not disclose or suggest all of the features recited in claims 4, 10, 17, and 24. For at least the foregoing reasons, the Office Action fails to establish a prima facie case of obviousness for those claims.

CONCLUSION

Reconsideration of the present application is respectfully requested in light of the foregoing remarks. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (512) 732-3927.

Respectfully submitted,

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